

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CHARLES TOWNSLEY, MICHAEL	§	
SAURO, WALTER NOFFSINGER,	§	
ROSA DAVIDSON, MICHAEL	§	
KELLY, TITON HOQUE, JANET	§	
GELPHMAN, THANH DO	§	
Plaintiffs,	§	
vs.	§	Civil Action No.: 1:20-cv-00969-LY
INTERNATIONAL BUSINESS	§	
MACHINES CORPORATION,	§	
Defendant.	§	

**PLAINTIFFS' ADVISORY TO THE COURT REGARDING
PLAINTIFFS' RESPONSE TO IBM'S MOTION FOR PROTECTIVE ORDER TO
LIMIT SCOPE OF 30(B)(6) DEPOSITION**

TO THE HONORABLE JUDGE OF SAID COURT:

1. Counsel for Plaintiffs, Charles Townsley, Michael Sauro, Walter Noffsinger, Rosa Davidson, Michael Kelly, Titon Hoque, Janet Gelphman and Thanh Do respectfully bring to this Court's attention three incorrect citations in footnotes 40, 41, and 42 of Plaintiffs' Response to IBM's Motion for Protective Order to Limit Scope of 30(b)(6) Deposition (hereinafter "Plaintiffs' Response").
2. Plaintiffs do not file this Advisory for the purpose of further supplementing their pleadings related to Defendant's Motion for a Protective Order to Limit Scope of 30(b)(6) Deposition. Instead, the undersigned counsel submits this Advisory to inform this Court that the citation in footnote 40 of Plaintiffs' Response should state: "***Hageman v. Accenture, LLP, No. CV 10-1759 (RHK/TNL), 2011 WL 13136510 at *2 (D. Minn. June 7, 2011) (emphasis added).***" Likewise, footnotes 41 and 42 should state "***Id. at *2-3***" and "***Id.***" respectively.

Respectfully submitted,

WRIGHT & GREENHILL, P.C.
4700 Mueller Blvd., Suite 200
Austin, Texas 78723
512/476-4600
512/476-5382 (Fax)



By: _____

Heidi A. Coughlin
State Bar No. 24059615
hcoughlin@w-g.com
Archie Carl Pierce
State Bar No. 15991500
cpierce@w-g.com
Blair J. Leake
State Bar No. 24081630
bbleake@w-g.com

and



By: _____

Kaplan Law Firm
Austin Kaplan
State Bar No. 24072176
akaplan@kaplanlawatx.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the Court and Defendants' counsel of record.



Heidi A. Coughlin